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KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania 216 Haddon Avenue, Ste. 406 Westmont, NJ 08108 (215) 627-1322 Attorneys for Toyota Lease Trust

IN THE MATTER OF:

Derek Bernard Battle DEBTOR(S),

IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY

CHAPTER 7 CASE NO. 19-23697 KCF

NOTICE OF MOTION FOR RELIEF FROM STAY

TO:

Derek Bernard Battle 1 Barge Lane Somerset, NJ 08873

Vincent Commisa 20 Manger Road West Orange, NJ 07052 Albert Russo Standing Chapter 13 Trustee CN 4853 Trenton, NJ 08650-4853

US TRUSTEE Office of the US Trustee One Newark Center, Suite 2100 Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Toyota Lease Trust**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **U. S. Courthouse**, **402 East State Street**; **Trenton**, **NJ**, for an Order to Grant Relief from the Automatic Stay to authorize the moving parties to prosecute a repossession action for the reason that the debtors have failed to maintain their monthly payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. The property involved is known as **2016 Toyota Highlander**, **VIN: 5TDJKRFH6GS299260**, . The hearing on this matter is scheduled for **February 25, 2020 at 10:00 A.M.**

Dated: January 31, 2020 /s/Denise Carlon, Esq.

Brian C. Nicholas, Esquire Denise Carlon, Esquire KML Law Group, P.C. 216 Haddon Avenue, Ste. 406 Westmont, NJ 08108 (215) 627-1322 dcarlon@kmllawgroup.com Attorney for Toyota Lease Trust